

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

INDICTMENT

UNITED STATES OF AMERICA,

v.

[1] DANIEL VASQUEZ-ALVAREZ,
[Counts 1-4] and,

[2] MARTIN MANUEL FERNANDEZ,
[Counts 1-3]

Defendants.

CRIMINAL NO. **21-069 (ADC)**

VIOLATIONS:

46 U.S.C. §§ 70503(a)(1), 70506(b);
21 U.S.C. §§ 952(a), 963;
& 18 U.S.C. §§ 924(c)(1)(A)(i) & 2.

**(FOUR COUNTS, NARCOTICS
FORFEITURE ALLEGATION,
& FIREARM FORFEITURE
ALLEGATION)**

THE GRAND JURY CHARGES:

COUNT ONE

**Conspiracy to Possess with Intent to Distribute a Controlled Substance
Aboard a Vessel Subject to the Jurisdiction of the United States
Title 46, United States Code, Sections 70503(a)(1), 70506(b)**

Beginning on a date unknown, but until and including March 7, 2021, in the District of
Puerto Rico, elsewhere and within the jurisdiction of this Court,

**[1] DANIEL VASQUEZ-ALVAREZ, and
[2] MARTIN MANUEL FERNANDEZ,**

the defendants herein, did knowingly and intentionally combine, conspire, confederate and agree
with each other, and with other diverse persons known and unknown to the Grand Jury to commit
an offense defined in Title 46, United States Code, Section 70503, to wit: to possess with intent to
distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of
cocaine, a Schedule II controlled substance, aboard a vessel subject to the jurisdiction of the United
States. All in violation of Title 46, United States Code, Sections 70503(a)(1) and 70506(b).

COUNT TWO
Possession with Intent to Distribute a Controlled Substance
Aboard a Vessel Subject to the Jurisdiction of the United States; Aiding and Abetting
Title 46, United States Code, 70503(a)(1);
and Title 18, United States Code, Section 2

On or about March 7, 2021, in the District of Puerto Rico, elsewhere and within the jurisdiction of this Court,

[1] DANIEL VASQUEZ-ALVAREZ, and
[2] MARTIN MANUEL FERNANDEZ,

the defendants herein, did knowingly and intentionally aid and abet each other to commit an offense defined in Title 46, United States Code, Section 70503, to wit: to possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, on board a vessel subject to the jurisdiction of the United States. All in violation of Title 46, United States Code, Sections 70503(a)(1) and 70506(b); and Title 18, United States Code, Section 2.

COUNT THREE
Conspiracy to Import a Controlled Substance
Title 21, United States Code, Sections 952(a) and 963

Beginning on a date unknown, but until and including March 7, 2021, from places outside of the United States, including Colombia and elsewhere,

[1] DANIEL VASQUEZ-ALVAREZ, and
[2] MARTIN MANUEL FERNANDEZ,

the defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other, and with other diverse persons known and unknown to the Grand Jury, to commit an offense defined in Title 21, United States Code, Sections 952(a) and 963, to wit: to knowingly and intentionally import into the United States five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 952(a) and 963.

COUNT FOUR
Possession of a Firearm in Furtherance of a Drug Trafficking Crime
Title 18, United States Code, Section 924(c)(1)(A)(i)

On or about March 7, 2021, in the District of Puerto Rico and within the jurisdiction of this Court,

[1] DANIEL VASQUEZ-ALVAREZ,

the defendant herein, did knowingly and unlawfully possess one (1) black Glock Pistol, Model 17, .9mm caliber, serial number HPS-345, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

NARCOTICS FORFEITURE ALLEGATION

The allegations contained in Counts **ONE**, **TWO** and **THREE** of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture.

Pursuant to Title 46, United States Code, Section 70507 and Title 21, United States Code, Section 970, upon conviction of an offense in violation of Title 46, United States Code, Section 70503, or Title 21, United States Code, Section 952, the defendants:

[1] DANIEL VASQUEZ-ALVAREZ, and
[2] MARTIN MANUEL FERNANDEZ,

shall forfeit to the United States of America property described in section 511 (a) of the Comprehensive Drug Abuse Prevention and Control Act of 1970 (21 U.S.C. § 881(a)) that was used or intended for use to commit, or facilitate the commission of, an offense under Title 46, United States Code, Section 70503 or Title 21, United States Code, Section 952.

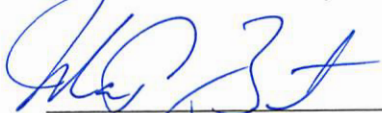
FIREARMS FORFEITURE ALLEGATION

The allegations contained in Count **FOUR** of this Indictment is hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18 United States Code, § 924(d)(1). Upon conviction of an offense in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), the defendant:


[1] DANIEL VASQUEZ-ALVAREZ,

shall forfeit to the United States of America any firearms and ammunition involved in the commission of the offense, including, but not limited to, one (1) black Glock Pistol, Model 17, .9mm caliber, serial number HPS-345, all pursuant to Title 18, United States Code, 924(d)(1) and Title 28, United States Code, Section 2461(c).

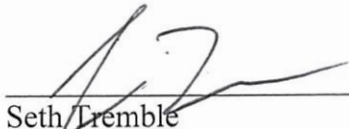
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Seth Tremble
Special Assistant United States Attorney

TRUE BILL

FOREPERSON

Date: *March 17, 2021*